

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE [REDACTED]

SEVERIANO LUGO ACOSTA
ANA REYES CAMACHO
DEBTOR(S)

SCOTIABANK DE PUERTO RICO
Movant

VS.

SEVERIANO LUGO ACOSTA
ANA REYES CAMACHO
JOSE R. CARRION MORALES,
TRUSTEE

CASE NO. 09-10354-SEK

CHAPTER 13

**DEBTORS' RESPONSE TO MOTION REQUESTING RELIEF
FROM THE AUTOMATIC STAY**

TO THE HONORABLE COURT:

COME NOW debtors in the above captioned case, through the undersigned attorney, and respectfully state and pray as follows:

1. Scotiabank de Puerto Rico filed a motion requesting relief from the automatic stay basically stating that debtors have eight (8) post-petition payments in arrears in their post-petition direct mortgage loan payments.
2. Debtors hereby respectfully submit that they are in the process of obtaining the funds to cure the arrears in direct post-petition payments to Scotiabank on or before the preliminary hearing scheduled for August 24, 2011.

WHEREFORE, debtors respectfully request from this Honorable Court that upon payment of the post- petition arrears, deny the motion for relief from stay filed by Scotiabank.

I CERTIFY that on this same date a copy of this notice was sent by the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; Scotiabank c/o Wallace Vazquez Sanabria, Esq; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtors, Severiano Lugo Acosta and Ana Reyes Camacho.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of August, 2011.

/s/ Roberto Figueroa Carrasquillo
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